

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

THIS DOCUMENT RELATES TO ALL
CASES

Master No.: 3:15-cv-07658 (MAS) (LHG)
and 16-cv-03087(MAS) (LHG)

ORDER OF THE SPECIAL MASTER

WHEREAS, the Parties appeared for a status conference before the Special Master on June 9, 2021, via Zoom, in advance of which written submissions were received from the Valeant Defendants¹, Defendant PricewaterhouseCoopers LLP (“PwC”), the Direct Action Plaintiffs in Case No. 18-cv-00343-MAS-LHG (“Direct Action Plaintiffs”), the Class Action Plaintiff City of Tucson in Case No. 3:15-cv-07658 (“Class Plaintiff”), and the Class Plaintiffs in Case No. 3:16-cv-03087-MAS-LHG.

WHEREAS, the Parties made a request for an expert discovery and summary judgment schedule and procedure;

WHEREAS, the Direct Action Plaintiffs requested that the testimony of Seana Carson be barred at the time of trial;

WHEREAS, the Direct Action Plaintiffs requested a briefing schedule for a Motion to preclude the Valeant Defendants from asserting a defense of reliance on counsel or otherwise invoking the advice of counsel in contesting Plaintiffs’ claims;

¹ For purposes of this Order, the “Valeant Defendants” include Valeant Pharmaceuticals International, Inc. n/k/a Bausch Health Companies, Inc., the Stock Underwriter Defendants, Howard B. Schiller, Tanya Carro, Deborah Jorn, J. Michael Pearson, and the VAC Defendants.

IT IS HEREBY ORDERED that the Parties are to meet and confer to discuss the scheduling and procedure to be followed for expert discovery and summary judgment motions. The Parties are also to discuss the issues related to the discovery of Defendant PricewaterhouseCoopers LLP. The Parties are to conduct this meet and confer prior to the next status conference scheduled with the Special Master at which time the Parties should be prepared to present the issues and their proposals.

IT IS FURTHER ORDERED that the deadline to serve affirmative expert reports will be extended to August 12, 2021, the deadline to serve rebuttal expert reports will be extended to October 11, 2021, and the deadline to serve reply expert reports will be extended to November 11, 2021.

IT IS FURTHER ORDERED that the following briefing schedule shall apply to Direct Action Plaintiffs' Motion to preclude the Valeant Defendants from asserting a defense of reliance on counsel or otherwise invoking the advice of counsel in contesting Plaintiff's claims;

Moving Brief	June 30, 2020
Opposition Brief	July 21, 2021
Reply Brief	August 4, 2021

IT IS FURTHER ORDERED that the Special Master has set another scheduling conference for July 8, 2021, at 10:00 A.M., to be conducted via Zoom. The Parties are to submit any correspondences or proposed agendas by July 2, 2021, at 5pm.

Dennis M. Cavanaugh

DENNIS M. CAVANAUGH, U.S.D.J. (Ret.)
Special Master

Date: June 9, 2021